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NHTSA - 00 - 701344
RSM 8/25/00

DEPT. OF TRANSPORTATION
DOCKETS

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From: versuch.berlin@petriag.com
To: Harper, Clarke <NHTSA>
Date: 7/4/00 3:10AM
Subject: FMVSS 208 FINAL RULE

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> Von: Kloidt Stephan
> Gesendet: Freitag, 30. Juni 2000 13:28
> An: Stoehr Andreas
> Betreff: Bitte weiterleiten an charper@NHTSA.dot.gov mit der
> Betreffzeile FMVSS 208 FINAL RULE
>
> Dear Mr. Harper,
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>
> the PETRI AG Berlin Engineering Center for Automotive Safety is currently
> working on several advanced airbag development projects. We certainly
> intend to integrate FMVSS regulations.
> Unfortunately, we have some interpretation problems with NHTSA's ATD
> seating procedures, especially of the 3YO/6YO and 5% female
> out-of-position situations.
>
> First problem
>
> According to §22.4.2.4, the 3YO child dummy has to be positioned 5 mm off
> any vehicle interior obstacles (e.g. windshield) during the process of
> directing it to the 'chest on instrument panel' position.
>
> We wonder whether the dummy now has to be
>
> * lowered by 5 mm at obstacle contact position (and then stop) only OR
> * kept free of contact (clearance 5 mm) but then moved further in the
> direction of the instrument panel.
>
> Thus, it is very important for us to know the exact order (sequence) of
> the steps.
>
> An equivalent problem occurs by resolving the 6YO (§24.3) and 5% female
> (§26) positions.
>
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> Second problem
>
> According to §22.4.3, the child dummy has to be positioned by setting the
> seat in mid-height and then sliding it forward until contact (dummy - IP)
> is made or the seat track's end position is reached. If no contact was
> established, the dummy shall be moved forward (190 mm max. or until
> contact is made) and so on.
> This would mean that there is no defined relation between the airbag
> module position in the IP and the head, but dummy position only depends on
> seat construction -even though §22.4.3 is called 'head on IP' and should
> represent a worst case scenario where the head should be located near the
> airbag module cover. In this case, we would ask you for a statement.
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> Thank you very much in advance for your support.

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> Best regards

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> Stephan Kloidt

> Petri AG

> Berlin Engineering Center for Automotive Safety

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